

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

In the Matter of the Search of:

T Mobile Revvl Plus Cool pad
cellular , (2) Samsung Galaxy
cellulars, (2) Deer Primos
Deer Cameras

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Case No. *3:20mj 76*

**AFFIDAVIT IN SUPPORT
OF APPLICATION FOR SEARCH WARRANT**

I, Melissa L. Ragland, being first duly sworn, do hereby state the following:

AFFIANT'S EXPERIENCE

1. I am a Senior Special Agent with the United States Secret Service (the "USSS") and have been employed with that agency since March 14, 1999. I am currently assigned to the USSS field office in Charlotte, North Carolina. In my nearly 21 years of experience with the USSS, I have been involved with the investigation of various forms of federal crimes, including counterfeit Federal Reserve Notes, credit card fraud, bank fraud, counterfeit checks, access fraud, identity theft, wire fraud, skimming cases, and various other crimes.
2. In my training and experience, I have learned and understand how counterfeit currency operations are enabled, the criminal methodology of passing counterfeit currency for criminal gain, and

the encompassing methodology of criminal conspiracy that allows a major counterfeit operation to sustain itself.

PURPOSE OF THE AFFIANT

3. I make this affidavit in support of an application for a search warrant cellular phones, more particularly described below. On January 31, 2020, a federal search warrant was executed at the residence of JAMES DAVID SHORES ("SHORES") AND JESSICA ROSE ALFORD ("ALFORD") located at 1302 Kennedy Rd, Thomasville, NC 27360, (hereafter, "the Premises") for evidence relating to counterfeit currency (Title 18, United States Code, Section 471), money laundering (Title 18, United States Code, Section 1956), and conspiracy to commit those crimes (Title 18, United States Code, Section 371). On February 4, 2020, SHORES and ALFORD were arrested on federal charges.
4. During the execution of the federal search warrant at the SHORES and ALFORD residence, law enforcement agents seized various cellular telephones and deer cameras. These cellular telephones and deer cameras are currently stored in the U.S. Secret Service Charlotte District Field Office vault located in Charlotte, North Carolina, within the Western District of North Carolina. I respectfully submit that the facts in this affidavit establish probable cause to support a

search warrant of these items, and the electronic data contained therein, specifically:

a. Cellular Telephones

(1) T-Mobile Revvl Plus Cool Pad Cellular phone

IMEI:861273032576416;

(2) Samsung Galaxy cellular telephone IMEI: 359797091956779

(3) Samsung Galaxy cellular telephone IMEI:359620100157231

b. Deer Cameras

(1) Primos black in color Serial # 63032 66529

(2) Primos green in color Serial # 6316WM20929

5. I have based this affidavit on my personal knowledge, training, experience, and observations made during the course of this investigation, as well as information provided to me by other law enforcement officers and individuals who have knowledge of the facts of this case. Because I am submitting this affidavit for the limited purpose of securing a search warrant, I have not included details of every aspect of the investigation.

PROBABLE CAUSE

6. Jason David Shores ("SHORES") and Jessica Rose Alford ("ALFORD") are the targets of an ongoing investigation by the USSS. To date, the investigation has shown that between on or about June

2017 and February 4, 2020, SHORES and ALFORD have passed or attempted to pass counterfeit \$20 bills in U.S. currency (hereinafter “counterfeit \$20 bills”) at stores throughout North Carolina and South Carolina. SHORES and ALFORD target stores such as Lowe’s and Home Depot, and to date, have successfully passed approximately \$240,000 in counterfeit \$20 bills. In addition, they have attempted to pass counterfeit \$20 bills on a number of occasions, but have been denied by store personnel.

7. In total, SHORES and ALFORD have successfully passed counterfeit \$20 bills on approximately 384 different dates and in approximately 671 different incidents, sometimes passing counterfeit \$20 bills at different store locations but on the same date.
8. On several occasions, SHORES or ALFORD appear to have returned merchandise purchased with counterfeit \$20 bills at different stores in order to receive genuine currency.
9. As examples, I have investigated the following incidents, among others:
 - a. On June 24, 2017, SHORES attempted to pass approximately \$280 in counterfeit currency at the Lowe’s store located at 2005 East Cone Boulevard in Greensboro, North Carolina. The store clerk

did not accept the currency and returned it to SHORES. Surveillance cameras captured the incident.

- b. On July 5, 2017, SHORES attempted to pass approximately \$280 in counterfeit currency at the Lowe's store located at 5201 U.S. 29 in Reidsville, North Carolina. The store clerk did not accept the currency and returned it to SHORES. Surveillance cameras captured the incident.
- c. On February 4, 2018, at approximately 1:06 p.m., SHORES attempted to pass approximately \$240 in counterfeit currency at the Lowe's store located at 1120 East Dixie Drive in Asheboro, North Carolina. The store clerk did not accept the currency and returned it to SHORES. Surveillance cameras captured the incident.
- d. On April 5, 2019, SHORES successfully passed approximately \$280 in counterfeit currency at the Lowe's store located at 1801 Fordham Boulevard in Chapel Hill, North Carolina. Approximately 20 minutes later, ALFORD successfully passed approximately \$300 in counterfeit currency at the same Lowe's store. Surveillance cameras captured both incidents.
- e. On September 4, 2019, SHORES successfully passed approximately \$280 in counterfeit currency at the Lowe's store

located at 8670 Concord Mills Boulevard in Concord, North Carolina. Approximately 20 minutes later, ALFORD successfully passed approximately \$300 in counterfeit currency at the same Lowe's store. Surveillance cameras captured both incidents.

- f. On September 14, 2019, SHORES successfully passed approximately \$280 in counterfeit currency at the Lowe's store located at 7144 Highway 73 in Denver, North Carolina. Approximately 12 minutes later, ALFORD successfully passed approximately \$300 in counterfeit currency at the same Lowe's store. Surveillance cameras captured both incidents. Approximately 36 minutes later, SHORES and ALFORD were at the Lowe's store located at 1603 East Main Street in Lincolnton, North Carolina. By car, that store is approximately 25 minutes away from the Lowe's in Denver, North Carolina. At the store in Lincolnton, SHORES returned the items that ALFORD had purchased immediately prior at the store in Denver. Six minutes later, at the same store in Lincolnton, ALFORD successfully passed approximately \$300 in counterfeit currency. Nine minutes after that, SHORES successfully passed approximately \$300 in counterfeit currency at the same store. Surveillance cameras captured the return as well as both purchases.

- g. On October 28, 2019, ALFORD successfully passed approximately \$280 in counterfeit currency at the Lowe's store located at 1350 Springdale Road in Rock Hill, South Carolina. Also on October 28, 2019, approximately 11 minutes later, SHORES successfully passed approximately \$280 in counterfeit currency at the same store and at the same cashier's station. Surveillance cameras captured both incidents.
10. On a number of occasions, surveillance video shows ALFORD using a cellular telephone in her possession to send textual transmissions while store clerks counted or examined the counterfeit \$20 bills.
 11. To date, SHORES and ALFORD have successfully passed approximately 12,000 counterfeit \$20 bills.
 12. Genuine Federal Reserve Notes contain unique identifying serial numbers. SHORES and ALFORD have passed or attempted to pass counterfeit Federal Reserve Notes that contain false serial numbers. Among the approximately 12,000 counterfeit \$20 bills that SHORES and ALFORD have successfully passed to date, there are approximately 2,800 unique serial numbers. Put differently, SHORES and ALFORD either create or obtain multiple counterfeit \$20 bills that contain the same serial number.

13. Fingerprint analysis conducted by the USSS revealed one latent print belonging to SHORES on one of the counterfeit \$20 bills successfully passed on October 28, 2019, as described above. The serial number on the counterfeit \$20 bill containing SHORES's fingerprint was MI22433149B. Other counterfeit \$20 bills with the same serial number were passed on October 25, 2019, and October 28, 2019. Surveillance videos from those dates and those stores show both SHORES and ALFORD passing counterfeit currency.
14. On or about June 10, 2017, an anonymous caller advised Davidson County Sheriff's Office that SHORES and an individual named Timothy Beard were producing counterfeit Federal Reserve Notes and dealing drugs at the Premise. Davidson County Sheriff's Deputies conducted a knock and talk at the Premises, wherein, SHORES and Joyce Shores, SHORES's grandmother, consented to a search of the Premises. As a result of the consent search, deputies located two counterfeit Federal Reserve Notes bearing serial numbers ME44554187G and MC08889191B. These two serial numbers were identified as having been passed by SHORES on five different dates at Lowe's stores in Salisbury, Greensboro and Winston Salem, North Carolina and once at a Speedway gas station.

15. On or about December 28, 2018, a Lowe's Loss Prevention Asset Protection employee, Jessica Valeiko, identified SHORES and ALFORD in-store as subjects who previously purchased items with counterfeit \$20 bills. At the time of the identification, SHORES and ALFORD were shopping in the store. Valeiko went into the Lowe's parking lot and obtained the license plate information on a black Chevrolet Colorado truck, which Valeiko had seen on surveillance video during ALFORD's and SHORES's previous visits to the store. Valeiko gave the registration number – N.C. tag number PLF1317 – to Jason Major, Lowe's Organized Retail Crime Manager, who conducted a search on two public databases (Vincheck.info and recordsfinder.com) for the above tag number. The registration showed the truck was registered in ALFORD's name, using the Premises as the registered address.
16. On or about August 9, 2019, USSS Computer Research Specialist Barbara Scott ("CRS Scott") conducted a database search on multiple law enforcement databases, confirming that N.C. tag number PLF1317 is listed for a Chevrolet Colorado truck and registered to ALFORD. That registration lists the Premises as the registered address. In addition, CRS Scott identified a 2006 Lexus bearing N.C. tag number VN84937 is listed to a registered owner of Joyce Shores,

residing at the Premises. ALFORD is listed as a driver of the Lexus. Joyce Shores is SHORES's grandmother. According to records, Joyce Shores is deceased.

17. Mecklenburg County in North Carolina employs a license-plate reader database (the "LPR Database"), which, through the use of surveillance cameras, catalogs license plates that travel at various intersections throughout the county. On or about October 30, 2019, USSS Task Force Office Matthew Mescan conducted a search for N.C. tag number PLF1317 and N.C. tag number VN84937 in the LPR Database for dates between August 1, 2019, and October 30, 2019. That query showed that N.C. tag number PLF1317, displayed on a black Chevrolet Colorado truck, was in the Charlotte area on or about August 13, 2019, October 1, 2019, and October 2, 2019. On or about approximately October 1, 2019, ALFORD and SHORES passed counterfeit \$20 bills at Lowe's Store No. 1920 located at 8826 Albemarle Road in Charlotte. The Lowe's receipt associated with that transaction revealed that SHORES checked out at approximately 2:40 p.m. The query of the LPR Database revealed N.C. tag number PLF1317 was in the vicinity of Harris Boulevard at 2:52 p.m. Harris Boulevard is down the street from Lowes Store No. 1920.

18. On or about November 4, 2019, CRS Scott conducted a search of North Carolina Department of Labor for employment on SHORES and ALFORD. She found no employment records for SHORES and that ALFORD has not been employed since 2017.
19. Both SHORES and ALFORD list the Premises as their residence on their driver's licenses from the North Carolina Division of Motor Vehicles. On or about March 17, 2019, ALFORD put the utilities at the Premises in her name.
20. My review of surveillance footage shows that SHORES or ALFORD, after a successful first pass of counterfeit currency by the other, will frequently attempt a second pass of counterfeit currency at the same register and with the same store clerk a short time after the first pass. ALFORD, who is usually the second to pass counterfeit currency, is frequently seen in surveillance video using her cellular telephone to send textual transmissions. Further, in my training and experience, co-conspirators in a criminal conspiracy frequently use cellular telephones to advance the goals of the conspiracy.
21. During the execution of the federal search warrant at the SHORES and ALFORD residence, law enforcement agents seized three cellular telephones and two deer cameras. Two of the cell phones were located in the residence and one was recovered from a truck in the garage.

Agents found one of the deer cameras in the garage on a shelf and the other deer camera was on the running board of the truck. Both deer cameras were on and operating and were positioned to capture who went into and out of the house. It appeared that the cameras were being used for surveillance. Agents also recovered equipment and supplies used to create counterfeit currency, such as uncut sheets of paper, an all-in-one printer, and a paper cutter.


CONCLUSION

22. Based upon the foregoing, there is probable cause to believe that three cellular telephones (1) T-Mobile RevvlPlus Cool Pad Cellular phone IMEI:861273032576416 and (2) Samsung Galaxy cellular telephone IMEI: 359797091956779 and (3) Samsung Galaxy cellular telephone IMEI:359620100157231 and two deer cameras (4) Primos black in color Serial # 63032 66529 and (5) Primos green in color Serial # 6316WM20929 contain stored electronic information evidence relating to the counterfeit money fraud (Title 18, United States Code, Section 471), money laundering (Title 18, United States Code, Section 1956), and conspiracy to commit those crimes (Title 18, United States Code, Section 371), as well as evidence related to the loss amounts associated with those crimes, including by not limited to the following information contained therein: the phone book/contact list; recent

calls (incoming and outgoing); SMS text messages, electronic mail messages, and any other communications; photographs, videos, emails and any data available in the target cellular telephones and deer cameras which include but are not limited to , those related to business activities, criminal activities associate name and addresses, the identity and location of assets illegally gained through criminal activity; information regarding target victims to include company names, addresses and telephone numbers, and the receipt and disposition of fraudulently obtained goods, services and fund.


Melissa L. Ragland
Senior Special Agent
United States Secret Service

SUBSCRIBED and SWORN before me on this 4 day of March, 2020.


Honorable David S. Cayer
United States Magistrate Judge

Attachment A

The property to be searched are as follows: (1) T-Mobile RevvlPlus Cool Pad cellular phone (IMEI:861273032576416); (2) Samsung Galaxy cellular telephone (IMEI: 359797091956779); (3) Samsung Galaxy cellular telephone (IMEI:359620100157231); (4) Primos deer camera black in color (serial number 63032 66529); and (5) Primos deer camera green in color (serial number 6316WM20929).

All property to be searched are located at a premises under the control of the United States Secret Service located in the Western District of North Carolina.

This warrant authorizes the forensic examination of the property to be searched for the purpose of identifying the electronically stored information as described in Attachment B.

Attachment B

All records to be searched for and seized on the property to be searched, described in Attachment A, relate to violations of counterfeit money fraud (Title 18, United States Code, Section 471), money laundering (Title 18, United States Code, Section 1956), and conspiracy to commit those crimes (Title 18, United States Code, Section 371), involving JAMES DAVID SHORES and JESSICA ROSE ALFORD since at least June 2017, including:

- a. All communications, records, files, videos, images, location data, and other information relating to the production or uttering of counterfeit U.S. currency.
- b. All communications, records, files, videos, images, location data, and other information relating to the proceeds of the production or uttering of counterfeit U.S. currency.
- c. All communications, records, files, videos, images, location data, and other information relating to a conspiracy, involving JAMES DAVID SHORES, JESSICA ROSE ALFORD, or other co-conspirators, to produce or to utter counterfeit U.S. currency.